



Deborah A. Crinigan, Esquire

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February 15, 2012

The Honorable Madeline Cox Arleo
Martin Luther King Building & US Courthouse
50 Walnut Street, Room 4015
Newark, NJ 07101

RE: Prystowsky v. TGC Stores, et al.
U.S. District Court for the District of N.J., Civil Action No. 2:07-cv-
00072 (SDW)(MCA)
Final Pretrial Conference – March 20, 2012 at 10:00 a.m.

Dear Judge Arleo:

As you may recall, the Court's January 4, 2012 Order related to the upcoming Final Pretrial Conference in the above-referenced matter directs the parties to submit a number documents to the Court by Monday, March 19, 2012. Among the documents identified are Agreed-Upon Jury Instructions and Voir Dire Questions.

The form Final Pretrial Order attached to the January 4, 2012 Order directs the parties to contact the Court's Deputy Clerk to secure copies of the Court's standard general jury instructions, standard preliminary instructions read to the jury before the commencement of trial, and the Court's proposed and preferred voir dire questions. As directed, my paralegal contacted Deputy Clerk Phil Selecky for the identified documents. Mr. Selecky directed my paralegal to contact Judge Wigenton's clerk, Antigione for a copy of the documents.

My associate, Bill Doerler, spoke with Antigione on Tuesday, February 14, 2012, and asked her to send us the Court's standard instructions, as identified. Antigione advised Mr. Doerler that the Court would not provide copies of the identified documents until after the Final Pretrial Conference, and suggested that he contact your clerk, Jessica, for clarification about what will need to be provided to the Court before the Final Pretrial Conference.

As instructed, Mr. Doerler spoke with Jessica on February 14, 2012. She advised him that, in light of the fact that the Court's practice is to wait until after the Final Pretrial Conference to

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provide copies of its standard jury instructions and voir dire questions to the parties, the Agreed-Upon Jury Instructions and Voir Dire Questions will not to be provided to the Court before the conference on March 20, 2012.

I am writing to inform the Court of our conversations with chambers, and to confirm that the Court does not, in fact, expect the parties to provide copies of Agreed-Upon Jury Instructions and Voir Dire questions to the Court in advance of the Final Pretrial Conference. If the Court wants the parties to produce Agreed-Upon Jury Instructions and Voir Dire Questions in advance of the Final Pretrial Conference, I respectfully request that the Court advise the parties that these documents will still need to be produced and provide the parties with copies of the Court's standard and/or preferred jury instructions and voir dire questions.

If you have any questions about this matter, I am available at the convenience of the Court.

Respectfully submitted,

WHITE AND WILLIAMS LLP

/s/ Deborah A. Crinigan, Esquire

Deborah A. Crinigan, Esquire

DAC:wld

cc: The Honorable Susan D. Wigenton (via first class mail)
Stan Sexton, Esq. (via ECF)
Neil Sambursky, Esq. (via ECF)
Charles Simmons, Esq. (via ECF)
Charles Eblen, Esq. (via ECF)
Michael Naccarato, Esq. (via ECF)
William Schmidt, Esq. (via ECF)